

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
MCALLEN DIVISION

GREGORIO TREVIÑO, JR., et al §  
§  
*Plaintiffs,* §  
§  
v. § Civil Case No. 7:15-cv-435  
§  
HIDALGO COUNTY, TEXAS, et al §  
§  
*Defendants* §

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**DEFENDANTS' PROPOSED QUESTIONS FOR VOIR DIRE EXAMINATION**

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Defendants propose the following questions for voir dire examination at the trial of this action:

1. Have any of you ever had to file a grievance or complaint over problems at work, been forced to leave your employment because of problems with an employer or a co-employee or been terminated from an employment? Is there anything about those experiences that would make it difficult for you to be fair and impartial juror in the trial of this case?
2. As a result of any of those incidents, was there a claim for compensation of any kind?
  - A. Who was the claim made against?
  - B. What was the final outcome of the claim?
  - C. Did an attorney or representative assist you in making the claim?
  - D. Looking back, do you think that the compensation that was paid in that situation was fair?
  - E. How do you feel about the way that you were dealt with in connection with the claim in question?
3. Have you or anyone close to you been discriminated against or harassed in the workplace? Did you file a complaint about it? Was the complaint resolved to your satisfaction?
4. Has anyone filed a grievance or complaint over problems at work involving unfair treatment? Was it resolved? If not, did it turn into a lawsuit? Is there anything about those experiences that would make it difficult for you to be fair and impartial juror in the trial of this case? Did you suffer a financial loss because of this treatment?
5. Verify whether anyone has had dealings with Jerad Najvar, Austin Wheatley or Atlas, Hall & Rodriguez, LLP. Verify whether anyone has worked for Hidalgo County. Verify whether anyone knows any of the named witnesses.